

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GARY KOOPMANN, TIMOTHY KIDD and
VICTOR PIRNIK, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff(s),

v.

FIAT CHRYSLER AUTOMOBILES N.V.,
FCA US, LLC, SERGIO MARCHIONNE,
RICHARD K. PALMER, SCOTT
KUNSELMAN, MICHAEL DAHL, STEVE
MAZURE and ROBERT E. LEE

Defendants.

Civ. Action No: 15-cv-07199-JMF

CLASS ACTION

DECLARATION OF MICHAEL J. WERNKE

I, Michael J. Wernke, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner of the law firm of Pomerantz LLP, appointed by the Court as Lead Counsel in this action. I am personally involved in the representation of Lead Plaintiffs and the putative class, and submit this declaration in opposition to Defendants' Motion To Dismiss The Emissions-Related Claims From The Fourth Amended Complaint. I have personal knowledge of the matters set forth herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of the LexisNexis transcript of Fiat Chrysler's Automobiles NV, July 27, 2017 Q2 2017 Earnings Call.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Thompson Reuters transcript of Fiat Chrysler's Automobiles NV, July 27, 2017 Q2 2017 Earnings Call.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 21st day of September 2017, in New York, NY.

/s/ Michael J. Wernke
Michael J. Wernke